

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS


UNITED STATES OF AMERICA)
)
)
V.)
)
WALTER T. MAY)
Defendant)

FILED
IN CLERK'S OFFICE
2006 DEC 22 A 9:21
U.S. DISTRICT COURT
DISTRICT OF MASS.

**MOTION TO MODIFY TERMS AND CONDITIONS
OF DEFENDANT'S RELEASE**

Now comes the defendant, Walter May, in the above-entitled matter and respectfully requests that this Honorable Court allow him to modify his terms of release and allow him to go for a CranioSacral therapy appointment with Verena Johanna Smith, at 19 Crosby Avenue, Amherst, MA on December 29, 2006 from 1:30 p.m. to 3:30 p.m. Attached is a letter from Ms. Smith and Mr. May's neurologist, Dr. Michael Sorrell indicating that these appointment are medically necessary. The defendant plans to leave his house at 12:30 p.m. and expects that he will be back at home by 4:30 p.m.

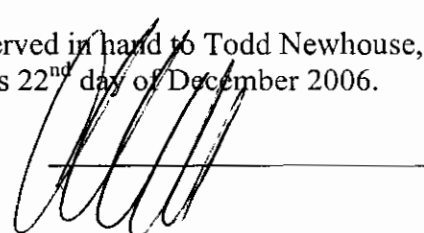
BY:



Alan J. Black, Esq.
1383 Main Street
Springfield, MA 01103
413-732-5381
BBO# 553768

CERTIFICATE OF SERVICE

I hereby certify that this document was served in hand to Todd Newhouse, AUSA and by facsimile to Chris Wylie, Pretrial Services on this 22nd day of December 2006.



Springfield Neurology Associates, LLC

300 Carew Street, Suite 2
Springfield, MA 01104
Tel: (413) 781-5050 Fax: (413) 781-2510

Michael R. Sorrell, M.D., F.A.A.N.
Emilio M. Melchionna, M.D.
Philip S. Hsu, M.D.
Michael L. Rossen, M.D., Ph.D.
George S. Patrick, M.D.
William Flanagan, Psy. D.
Amy Neal, P.A.-C
Heather Wightman, P.A.-C

Electromyography
Nerve Conduction Studies
Electro-encephalography
Evoked Response Testing
Myofascial Pain Program
Transcranial Doppler Studies

December 5, 2006

RE: Walter May

To Whom It May Concern:

Mr. May has atypical facial pain which does not respond to medication. The only treatment which has helped him in the past is craniosacral therapy. Mr. May is on home arrest because of criminal charges against him. He should be allowed to go to these treatments as an outpatient. These treatments are a matter of medical necessity.

Sincerely yours,



Michael R. Sorrell, M.D.
MRS:kml 12/11/06

Verena Johanna Smith Reg. Ac. Dipl Ac., CH (NCCAOM)
Practitioner of Oriental Medicine
19 Cosby Ave. Amherst, MA 01002
Tel: 413-549-2830 FAX: 413-549-4494

December 21, 2006

Re: Walter May
DOB: 2/24/44

To Whom It May Concern,

Walter was a patient of Lorna Kerbel, PT, CST and Pam McCormack, NCTMB, CST in 2003-4 for treatment of trigeminal neuralgia and whiplash. He responded very well to Cranio Sacral Therapy and his pain decreased enough to allow him to travel.

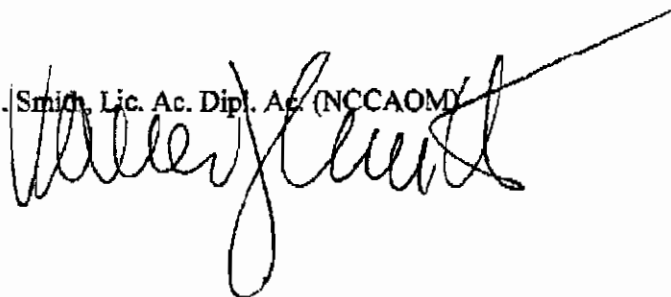
Walter, who is currently on home arrest because of criminal charges against him, is experiencing recurrence of significant trigeminal nerve pain. He would benefit from weekly treatment for 12 weeks with a re-evaluation of his needs at that time. The treatments sessions run for approximately two hours.

Walter can be seen at 19 Cosby Avenue in Amherst MA

Pending approval, his first appointment will be on Friday December 29th at 1.30 PM with future appointments to be scheduled at that time.

Sincerely,

Verena J. Smith, Lic. Ac. Dipl. Ac. (NCCAOM)

A handwritten signature in black ink, appearing to read 'Verena J. Smith', is written over the printed name. The signature is fluid and cursive, with a long horizontal stroke extending to the right.